

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	No. 20 CR 721
	)	
v.	)	Honorable Edmond E. Chang
	)	
KRIKOR TOPOUZIAN	)	

**MOTION TO DISMISS**

The UNITED STATES OF AMERICA, by its attorney, MORRIS PASQUAL, Acting United States Attorney for the Northern District of Illinois, moves that the Court dismiss the Information with prejudice as to defendant KRIKOR TOPOUZIAN, and states in support as follows:

Defendant has been charged in the Information with violating the Defense Production Act, in violation of Title 50, United States Code, Sections 4512 and 4513, based on his accumulation of N-95 respirator masks with the intent to resell the masks in excess of prevailing market prices. Dkt. 2.

The defendant entered into a pretrial diversion agreement with the government to defer defendant's prosecution for a period of six months, with defendant agreeing to pay a fine and complete a community service requirement. Dkt. 132.

The defendant has successfully completed and fulfilled the terms of the pretrial diversion agreement. Defendant has completed 60 hours of community service and on February 7, 2024, he paid his fine of \$26,000, as set forth in the agreement. Dkts. 136, 140. There have been no violations of his pretrial release conditions during the

diversionary period. The government has conferred with counsel for the defendant, Sergio E. Acosta, and the defendant has no objection to the Court granting this Motion to Dismiss with prejudice.

Wherefore, the government respectfully requests that the Court dismiss the Information with prejudice as to defendant KRIKOR TOPOUZIAN, and discharge the defendant of any obligations of his pretrial release.

Respectfully submitted,

MORRIS PASQUAL.  
Acting United States Attorney

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